



Danielle Hamilton <hamilton@loevy.com>

Jaimes, et al. v. Cook County, et al., 17-cv-8291 - Amended Response

Katie Roche <katie@loevy.com>

Thu, Feb 21, 2019 at 4:36 PM

To: Maria Avitia <mavitia@reiterburns.com>

Cc: Arthur Loevy <arthur@loevy.com>, Jon Loevy <jon@loevy.com>, "mike@loevy.com" <mike@loevy.com>, Danielle Hamilton <hamilton@loevy.com>, Elizabeth Ekl <eekl@reiterburns.com>, "Terrence M. Burns" <tburns@reiterburns.com>, "Paul A. Michalik" <pmichalik@reiterburns.com>, "Daniel M. Noland" <dnoland@reiterburns.com>, "Katherine C. Morrison" <kmorrison@reiterburns.com>, Daniel Burns <DBurns@reiterburns.com>

Thanks, Maria. When should we expect production of the policies themselves?

Thanks,

Katie

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Katie Roche

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Danielle Hamilton <hamilton@loevy.com>

Jaimes v. Cook County

Danielle Hamilton <hamilton@loevy.com>

Thu, Feb 28, 2019 at 5:02 PM

To: Elizabeth Ekl <eekl@reiterburns.com>

Cc: Katie Roche <katie@loevy.com>, Mike Kanovitz <mike@loevy.com>

Beth, thanks for the update. We are still missing the following:

- Erika Aguirre Cook County Sheriff's Police Department tests and results (RFP No. 11) - requested November 2018
- Cook County insurance policy effective Nov 2015 (RFP No. 9) - requested November 2018, you've given us the policy numbers but not the policies themselves
- Employee vs. employee OPR complaints (RFP No. 18) - ordered produced by the Court on October 29, 2018

These documents were ordered to be produced or requested four months ago. And we proposed dates for the depositions 2 weeks ago. Given the tight deadlines in this case, we cannot waste any more time. Please confirm in writing by COB tomorrow that these documents will be produced no later than March 4 so that we may review them in time for the depositions beginning the week of March 11. Please also confirm in writing by COB tomorrow that dates and deponents for depositions during the week of March 11 will be set no later than March 4 so that we can adequately prepare.

If we do not hear from you, we will file a motion with the Court on the outstanding discovery, issue notices for the depositions, and proceed from there.

Thanks for your attention to these matters,
Danielle

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On Thu, Feb 28, 2019 at 11:39 AM Elizabeth Ekl <eekl@reiterburns.com> wrote:

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